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21                  Attorneys for Plaintiff Gor Gevorkyan

22                  **UNITED STATES DISTRICT COURT**  
23                  **NORTHERN DISTRICT OF CALIFORNIA**

24                  Gor Gevorkyan on behalf of himself and all  
25                  others similarly situated,

26                  Plaintiff,

27                  vs.

28                  Bitmain, Inc., Bitmain Technologies, Ltd.  
and DOES 1 to 10,

29                  Defendants.

30                  **THE MARLBOROUGH LAW FIRM, P.C.**  
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37                  Case Number: 3:18-cv-07004-JD

38                  **DECLARATION OF KARO  
39                  KARAPETYAN IN SUPPORT OF  
40                  PLAINTIFF'S SUPPLEMENTAL  
41                  MEMORANDUM OF LAW IN  
42                  OPPOSITION TO DEFENDANT'S  
43                  MOTION TO DISMISS**

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45                  **DECLARATION OF KARO KARAPETYAN IN SUPPORT OF PLAINTIFF'S  
46                  SUPPLEMENTAL MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT'S  
47                  MOTION TO DISMISS**

## DECLARATION OF KARO KARAPETYAN

I, KARO KARAPETYAN, declare as follows:

1. I am a citizen of Los Angeles, California at all times relevant. I am acting counsel for the named Plaintiff, Gor Gevorkyan (“Plaintiff”). I make this declaration in support of Plaintiff’s Supplemental Memorandum of Law in Opposition to Bitmain Technologies, Ltd.’s (“Bitmain HK”) Motion to Dismiss. If called as a witness, I could and would testify competently to the following facts, all of which are within my own personal knowledge.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Transcript of December 19, 2019 Court Proceedings (Hearing Tr.).

3. Attached hereto as **Exhibit 2** is a true and correct copy of

Conditionally filed herewith under seal.

4. Attached hereto as **Exhibit 3** is a true and correct copy of

Conditionally filed

herewith under seal.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a screenshot of a statement Bitmain HK posted on its blog at

<https://blog.bitmain.com>.<https://blog.bitmain.com/en/fraudulent-use-of-bitmain-brand-by-bitmain-farm-and-antminersmining-com>/ (last visited June 11, 2020).

6. Attached hereto as **Exhibit 5** is a true and correct copy of a screenshot of Bitmain Support webpage which can be found at <https://service.bitmain.com/support>.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a screenshot of Bitmain HK's "Contact Us" Webpage which can be found at <https://www.bitmain.com/contact> (last visited June 11, 2020).

8. Attached hereto as **Exhibit 7** is a true and correct copy of a job posting from Bitmain HK for Sales Specialists in San Jose, California, found on Bitmain HK's LinkedIn page which can be found at <https://www.linkedin.com/jobs/view/sales-specialist-at-bitmain-962990492/> (last visited June 11, 2020).

9. Attached hereto as **Exhibit 8** is a true and correct copy of a screenshot of Bitmain HK's official YouTube Channel webpage which can be found at  
<https://www.youtube.com/channel/UCrjWmBeM0ezBsrPiHvUoeag>;  
<https://www.youtube.com/channel/UCrjWmBeM0ezBsrPiHvUoeag/about>; and  
[https://www.youtube.com/watch?v=Xaa\\_-jQ4NvM](https://www.youtube.com/watch?v=Xaa_-jQ4NvM) (last visited June 11, 2020).

10. Attached hereto as **Exhibit 9** is a true and correct copy of

Conditionally filed herewith under seal.

11. Attached hereto as **Exhibit 10** is a true and correct copy of an

Conditionally filed herewith

under seal.

12. Attached hereto as **Exhibit 11** is a true and correct copy of a Silicon Valley Business Journal news article published on June 16, 2018 titled: "Exclusive: Chinese cryptocurrency giant fills last vacancy in downtown San Jose office tower." which can be found on <https://www.bizjournals.com/sanjose/news/2018/07/16/bitmain-technologies-san-jose-office-riverpark.html> (Last visited June 11 ,2020).

13. Attached hereto as **Exhibit 12** is a true and correct copy of portions of Bitmain Technologies Holding Company's IPO prospectus, including an Organizational Chart.

14. Attached hereto as **Exhibit 13** is a true and correct copy of:

Conditionally filed herewith under seal.

15. Attached hereto as **Exhibit 14** is a true and correct copy of a screenshot of State of Delaware Division of Corporations – Filings (Last visited June 11, 2020).

16. Attached hereto as **Exhibit 15** is a true and correct copy of the job posting by Bitmain HK on the Indeed.com website.

17. Attached hereto as **Exhibit 16** is a true and correct copy of an

Conditionally filed

herewith under seal.

18. Attached hereto as **Exhibit 17** is a true and correct copy of the Declaration of Luyao Liu in litigation in the Southern District of Florida.

19. Attached hereto as **Exhibit 18** is a true and correct copy of May 10, 2020 news article by CoinGeek, available at <https://coingeek.com/bitmain-thugs-nabbed-after-allegedly-stealing-govt-property-in-beijing-report> (Last visited June 11, 2020).

20. Attached hereto as **Exhibit 19** is a true and correct copy of June 4, 2020 news article by Cointelegraph available at <https://cointelegraph.com/news/micree-zhan-reportedly-used-private-guards-to-physically-take-over-bitmain> (Last visited June 11, 2020).

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and that this Declaration was executed on this 11<sup>th</sup> day of June 2020, in Los Angeles, CA.

Karo Karapetyan

KARO KARAPETYAN